

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 25-90138</b>
<b>Geden Holdings, Ltd.</b>	§	
	§	<b>Chapter 15</b>
<b>Debtor in a Foreign Proceeding</b>	§	

**DEBTOR’S EMERGENCY MOTION TO APPLY COMPLEX CASE  
PROCEDURES TO CHAPTER 15 CASE**

**EMERGENCY RELIEF HAS BEEN REQUESTED. RELIEF IS REQUESTED NOT LATER THAN 11:00 A.M. (PREVAILING CENTRAL TIME) ON MAY 1, 2025.**

**IF YOU OBJECT TO THE RELIEF REQUESTED OR YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU MUST APPEAR AT THE HEARING IF ONE IS SET, OR FILE A WRITTEN RESPONSE PRIOR TO THE DATE THAT RELIEF IS REQUESTED IN THE PRECEDING PARAGRAPH. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.**

**A HEARING WILL BE CONDUCTED IN THIS MATTER ON MAY 1, 2025 AT 11:00 A.M. (PREVAILING CENTRAL TIME) IN COURTROOM 400, 4TH FLOOR, 515 RUSK AVENUE, HOUSTON, TX 77002.**

**PARTICIPATION AT THE HEARING WILL ONLY BE PERMITTED BY AN AUDIO AND VIDEO CONNECTION.**

**AUDIO COMMUNICATION WILL BE BY USE OF THE COURT’S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT 832-917-1510. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE PEREZ CONFERENCE ROOM NUMBER IS 282694. VIDEO COMMUNICATION WILL BE BY USE OF THE GOTOMEETING PLATFORM. CONNECT VIA THE FREE GOTOMEETING APPLICATION OR CLICK THE LINK ON JUDGE PEREZ’S HOME PAGE. THE MEETING CODE IS “JUDGEPEREZ”. CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING.**

**HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF BOTH ELECTRONIC AND IN-PERSON HEARINGS. TO MAKE YOUR APPEARANCE, CLICK THE “ELECTRONIC APPEARANCE” LINK ON JUDGE PEREZ’S HOME PAGE. SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK “SUBMIT” TO COMPLETE YOUR APPEARANCE.**

Dr. Reuben Balzan (the “Petitioner” or “Foreign Representative”), in his capacity as the authorized representative of the above-captioned debtor (the “Debtor” or “Geden”) regarding the Debtor’s court ordered liquidation in Malta (the “Malta Proceeding”) before the First Hall of the Civil Court (the “Maltese Court”), respectfully files this motion (the “Motion”) to apply the Procedures for Complex Chapter 11 Cases in the Southern District of Texas (the “Complex Case Procedures”) to this chapter 15 case (the “Chapter 15 Case”).

### **Jurisdiction and Venue**

1. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). The Debtor confirms its consent, pursuant to Bankruptcy Rule 7008, to the entry of a final order by the Court.

2. This chapter 15 case has been properly commenced pursuant to section 1504 of the Bankruptcy Code by the filing of a petition for recognition of the Malta Proceeding under section 1515 of the Bankruptcy Code.

3. Venue is proper pursuant to 28 U.S.C. § 1410(1). The Debtor’s principal asset<sup>1</sup> in the United States constitutes a retainer held by Okin Adams Bartlett Curry, LLP in a bank account maintained at Frost Bank in Houston, Texas.

4. The basis for the relief requested herein is section 105(a) of the Bankruptcy Code.

### **Background**

#### **I. General Background**

5. On April 28, 2025 (the “Petition Date”), the Debtor filed a voluntary chapter 15 petition for recognition of a foreign proceeding (the “Chapter 15 Case”) under chapter 11 of the

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<sup>1</sup> As described in the Declaration, the Foreign Representative suspects, but does not know, whether additional assets of the Debtor reside in the United States.

Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court”).

II. **The Malta Proceeding**

6. On June 15, 2017, the Maltese Court adjudicated Geden insolvent and ordered its dissolution and winding up. Additionally, the Windup Order appointed Paul Darmanian (the “First Liquidator”) as liquidator.

7. On September 12, 2018, the First Liquidator filed an application with the Maltese Court to be relieved of the duties as the liquidator of Geden. On September 19, 2018, the Maltese Court granted the First Liquidator’s application and allowed the First Liquidator to resign as the liquidator of Geden.

8. On December 1, 2023, Eclipse Liquidity, Inc, (“Eclipse”), a creditor of Geden, filed an application to appoint a new liquidator.

9. On December 4, 2023, the Maltese Court appointed Dr. Reuben Balzan (the “Liquidator”) as the liquidator of Geden.

**Motion**

10. This Chapter 15 Case is a complex proceeding pursuant to the Complex Case Procedures, because:

- ☐ The Foreign Debtor has a total debtor of more than \$10 million;
- ☐ There are more than 50 parties in interest in this case;
- ☐ Claims against the Foreign Debtor are publicly traded;
- ☒ Other

11. The Liquidator believes that the *Procedures for Complex Cases in the Southern District of Texas* (the “Complex Procedures”) will specifically assist the Liquidator in facilitating the participation of potential witnesses at the “first day” hearing and for other subsequent hearings. The Complex Procedures, specifically sections A.3 (the requirement that all first day hearings be

virtual), H (procedures for remote participation), and I (additional procedures for virtual hearings), provide a predictable framework to both to prosecute the “first day” hearing virtually and provide clear procedures going forward.

12. The Foreign Representative requests that the Court apply the Complex Case Procedures to this Chapter 15 Case.

WHEREFORE, the Foreign Representative respectfully requests that the Court enter an order, substantially in the form attached hereto, granting the relief requested in this Motion and granting such other and further relief as is appropriate under the circumstances.

Respectfully submitted,

**OKIN ADAMS BARTLETT CURRY LLP**

By: /s/ Edward A. Clarkson, III

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**ATTORNEYS FOR THE FOREIGN  
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